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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
LIGHTSQUARED INC., <i>et. al.</i> ,)	Case No. 12-12080 (SCC)
)	
Debtors. ¹)	Jointly Administered
)	
SANJIV AHUJA,)	Case No. 15-cv-2342 (KBF)
)	
Appellant,)	
)	
v.)	
)	
LIGHTSQUARED INC., <i>et. al.</i> ,)	
)	
Appellees.)	
)	

**APPELLANT’S STATEMENT OF ISSUES AND DESIGNATION OF
RECORD ON APPEAL WITH RESPECT TO APPEAL OF THE ORDER
CONFIRMING MODIFIED SECOND AMENDED JOINT PLAN
PURSUANT TO CHAPTER 11 OF BANKRUPTCY CODE**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal or foreign tax or registration identification number, are: LightSquared Inc. (8845), LightSquared Investors Holdings Inc. (0984), One Dot Four Corp. (8806), One Dot Six Corp. (8763), SkyTerra Rollup LLC (N/A), SkyTerra Rollup Sub LLC (N/A), SkyTerra Investors LLC (N/A), TMI Communications Delaware, Limited Partnership (4456), LightSquared GP Inc. (6190), LightSquared LP (3801), ATC Technologies, LLC (3432), LightSquared Corp. (1361), LightSquared Finance Co. (6962), LightSquared Network LLC (1750), LightSquared Inc. of Virginia (9725), LightSquared Subsidiary LLC (9821), LightSquared Bermuda Ltd. (7247), SkyTerra Holdings (Canada) Inc. (0631), SkyTerra (Canada) Inc. (0629) and One Dot Six TVCC Corp. (0040). The location of the debtors’ corporate headquarters is 10802 Parkridge Boulevard, Reston, VA 20191.

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, Mr. Sanjiv Ahuja (“Appellant”) hereby submits the following statement of issues to be presented and designation of record items to be included in the record on appeal to the to the United States District Court for the Southern District of New York in connection with the Notice of Appeal filed by Appellant on March 27, 2015 with respect to the Order Confirming Second Amended Joint Plan Pursuant to Chapter 11 of Bankruptcy Code (Dkt. No. 2276).

I. STATEMENT OF ISSUES ON APPEAL

1. Did the Bankruptcy Court err in determining that the Plan satisfied the “cramdown” requirements of 11 U.S.C. § 1129(b) that the Plan was fair and equitable with respect to the common equity interests held by Sanjiv Ahuja?
2. Did the Bankruptcy Court err in determining that the Plan satisfied the requirement of 11 U.S.C. § 1123(a)(4) that all similarly situated claimants be treated the same, despite the fact that the 90% shareholder is receiving 45% of the shares in the reorganized company and Sanjiv Ahuja, who owns 8% of the shares, is receiving nothing?
3. Did the Bankruptcy Court err in determining that the Plan was proposed in good faith as required by 11 U.S.C. § 1129(a)(3)?

II. RECORD ON APPEAL

The Appellant designate the following items to be included in the record on appeal:

A. Items Included in the Bankruptcy Court Docket

Item	Filing Date	Docket No.	Description
1	March 27, 2015	2276	Order Confirming Modified Second Amended Joint Plan Pursuant to Chapter 11 of Bankruptcy Code
2	March 27, 2015	2285	Transcript regarding Hearing Held on March 26, 2015 RE: Confirmation Hearing
3	March 19, 2015	2255	Transcript regarding Hearing Held on March 18, 2015 RE: Confirmation Hearing

Item	Filing Date	Docket No.	Description
4	March 18, 2015	2254	Transcript regarding Hearing Held on March 17, 2015 RE: Confirmation Hearing
5	March 17, 2015	2249	Transcript regarding Hearing Held on March 16, 2015 RE: Confirmation Hearing
6	March 13, 2015	2236	Transcript regarding Hearing Held on March 12, 2015 RE: Confirmation Hearing
7	March 12, 2015	2235	Transcript regarding Hearing Held on March 11, 2015 RE: Confirmation Hearing
8	March 11, 2015	2234	Transcript regarding Hearing Held on March 10, 2015 RE: Confirmation Hearing
9	March 10, 2015	2233	Transcript regarding Hearing Held on March 9, 2015 RE: Confirmation Hearing
10	March 17, 2015	2238	Modified Second Amended Joint Plan Pursuant to Chapter 11 of Bankruptcy Code/Notice of Filing Relating to Second Amended Joint Plan Pursuant to Chapter 11 of Bankruptcy Code
11	January 20, 2015	2035	Second Amended Disclosure Statement/Notice of Filing of Solicitation Version of Second Amended Specific Disclosure Statement for Second Amended Joint Plan Pursuant to Chapter 11 of Bankruptcy Code
12	July 17, 2012	223	Order (A) Approving Settlement Agreement Regarding Employment Agreement Claims, (B) Rejecting Employment Documents, and (C) Authorizing Any and All Actions Necessary to Consummate Settlement Agreement Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code and Bankruptcy Rules 6006, 9014 and 9019
13	July 6, 2012	213	Motion to Approve Compromise / Motion for Order, Pursuant to Sections 105(a) and 365(a) of Bankruptcy Code and Bankruptcy Rules 6006, 9014, and 9019, (A) Approving Settlement Agreement Regarding Employment Agreement Claims, (B) Rejecting Employment Documents, and (C) Authorizing Any and All Actions Necessary to Consummate Settlement Agreement

Item	Filing Date	Docket No.	Description
14	April 6, 2015	2297	Limited Objection of SP Special Opportunities, LLC to LightSquared's Motion for Order (A) Authorizing Use of Cash Collateral, if any, Through Plan Effective Date, (B) Establishing that Prepetition Secured Parties are Adequately Protected, and (C) Modifying Automatic Stay
15	March 31, 2015	2286	LightSquared's Motion for Order (A) Authorizing Use of Cash Collateral, If Any, Through Plan Effective Date, (B) Establishing That Prepetition Secured Parties Are Adequately Protected, and (C) Modifying Automatic Stay
16	March 25, 2015	2264	Supplemental Objection of Solus Alternative Asset Management LP and Objection to Confirmation of the Plan Proponents' Modified Second Amended Joint Plan Pursuant to Chapter 11 of Bankruptcy Code
17	March 25, 2015	2262	Post-Trial Brief of Equity Interest Holder Sanjiv Ahuja in Opposition to Confirmation of the Debtors Modified Second Amended Joint Plan of Reorganization
18	March 25, 2015	2261	Declaration of Avery Samet in Connection with Post-Trial Brief of Equity Interest Holder Sanjiv Ahuja in Opposition to Confirmation of the Debtors' Modified Second Amended Joint Plan of Reorganization
19	March 24, 2015	2258	Notice of Withdrawal of Objection of SP Special Opportunities, LLC to Confirmation of Second Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code
20	March 5, 2015	2185	Declaration of Matthew S. Barr in Connection with LightSquared's (I) Memorandum of Law in Support of Confirmation of Second Amended Joint Plan Pursuant to Chapter 11 of Bankruptcy Code and (II) Omnibus Response to Objections to (A) Confirmation of Plan, (B) Alternative Transaction Fee Motion, and (C) Inc. DIP Motion

Item	Filing Date	Docket No.	Description
21	March 5, 2015	2184	LightSquared's (I) Memorandum of Law in Support of Confirmation of Second Amended Joint Plan Pursuant to Chapter 11 of Bankruptcy Code and (II) Omnibus Response to Objections to (A) Confirmation of Plan, (B) Alternative Transaction Fee Motion, and (C) Inc. DIP Motion
22	February 26, 2015	2133	Objection of Solus Alternative Asset Management LP to Confirmation of the Second Amended Joint Plan Pursuant to Chapter 11 of Bankruptcy Code
23	February 26, 2015	2130	Objection of SP Special Opportunities, LLC to Confirmation of Second Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code
24	February 25, 2015	2127	Objection of Providence TMT Special Situations Fund LP and Providence TMT Debt Opportunity Fund II LP to (1) Second Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code and (2) Motion for Entry of Order Authorizing Payment of Alternative Transaction Fee in Connection with Proposed Plan or Reorganization
25	February 25, 2015	2122	Objection and Joinder in Objection of Centaurus Capital L.P., Keith Holst and Stephen Douglas to Confirmation of Debtors Second Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code and Objection of Sanjiv Ahuja to Confirmation of the Debtors Second Amended Joint Plan of Reorganization
26	February 25, 2015	2112	Objection of Centaurus Capital L.P., Keith Holst and Stephen Douglas to Confirmation of Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code
27	January 17, 2014	1235	Statement Regarding the FCC Exit Condition in Debtors Revised Second Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code

Item	Filing Date	Docket No.	Description
28	May 14, 2012	3	Declaration of Marc R. Montagner, Chief Financial Officer and Interim Co-Chief Operating Officer of Lightsquared Inc., (A) In Support of First Day Pleadings and (B) Pursuant to Rule 1007-2 of Local Bankruptcy Rules for United States Bankruptcy Court for Southern District of New York

B. Items Not Included in the Bankruptcy Court Docket

1. All Trial Exhibits submitted at the Confirmation Hearing.
2. Transcript of April 7, 2015 Hearing before the Bankruptcy Court.
3. Errata Sheet for Transcript regarding Hearing Held on March 26, 2015 RE:

Confirmation Hearing.

Dated: New York, New York
April 10, 2015

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